

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**U.S. SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**DENNIS J. MANCINO,
WILLIAM T. HIRSCHY,
DJK INVESTMENTS 10 INC.,
TJM INVESTMENTS INC., and
WT CONSULTING GROUP, LLC,**

Defendants.

2:18 –cv- 01316 – GRB - LGD

STIPULATION REGARDING DISMISSAL

WHEREAS DJK Investments 10 Inc. (“DJK”) and TJM Investments Inc. (“TJM”) were initially named as a defendant in the above-captioned civil enforcement action filed by the United States Securities and Exchange Commission (“SEC”); and

WHEREAS the SEC and counsel to DJK and TJM have agreed that DJK and TJM should be dismissed as defendants in this case; and

WHEREAS the SEC and DJK and TJM wish to resolve all outstanding issues by entering into this Stipulation Regarding Dismissal;

THEREFORE, in consideration of the above premises it is hereby agreed by and between the SEC and DJK as follows:

1. Dismissal of DJK and TJM. The SEC hereby agrees that it will dismiss DJK and TJM as a Defendants in this case.

2. Waiver of Claims. DJK and TJM hereby waive and releases any and all claims, demands, rights, and causes of actions, of every kind and nature, whether now known or unknown or asserted or unasserted, against the SEC and any of its present and former officers, agents, attorneys, employees, representatives, or contractors that arise from or in any way relate to the SEC’s Civil Enforcement Action. DJK specifically agrees to waive and release any and all claims for attorneys’ fees and expenses pursuant to the Equal Access to Justice Act, 28 U.S.C. 2412 et seq., (“EAJA”) arising from the investigation and the Civil Enforcement Action. This includes all claims, charges, or complaints relating in any way to the investigation and Civil Enforcement Action which could have been or could be brought before any state or federal court, any

administrative body, tribunal, board, or commission, or any other forum against the SEC and any of its present and former officers, agents, attorneys, employees, representatives, or contractors .

3. No Duress. DJK and TJM represent and warrant that in entering into and executing this Stipulation (a) he has relied on his own investigation and on the investigation of his own counsel; (b) he has been given a reasonable period of time within which to consider the terms and conditions of the Stipulation and has consulted with counsel regarding the terms and conditions of the Stipulation; and (c) he has voluntarily entered into this Stipulation without duress, coercion, or undue influence.

4. No Admission. This Stipulation has been entered into by the SEC and DJK and TJM solely for the purposes of facilitating DJK's dismissal as a Defendant in the Civil Enforcement Action. Therefore, this Stipulation is not intended and shall not be deemed an admission by either party of the merit or lack of merit of the opposing party's claims and/or defenses.

IN WITNESS WHEREOF, the parties hereto, intending to be bound, have stipulated and agreed to the foregoing.

FOR THE SEC:

/s/Duane K. Thompson
Duane K. Thompson
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549
Telephone: (202) 551-7159

*Counsel to Plaintiff Securities and
Exchange Commission*

Dated: December 13, 2023

FOR DJK AND TJM:

/s/ Jeffrey Chabrowe
Jeffrey Chabrowe (*chabrowe@gmail.com*)
261 Madison Avenue
12th Floor
New York, NY 10016
Telephone: (917) 529-3921

*Counsel to Defendants Dennis J. Mancino,
DJK, and TJM*

Dated: December 13, 2023

